

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ABSOLUTE SOFTWARE, INC. AND  
ABSOLUTE SOFTWARE CORPORATION

Plaintiffs,

v.

WORLD COMPUTER SECURITY CORPORATION  
AND FRONT DOOR SOFTWARE CORPORATION

Defendants.

Civil Action No. 1:09-cv-00142-LY

JURY TRIAL DEMANDED

---

**JOINT MOTION TO DISMISS WITH PREJUDICE**

---

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a separate agreement, the Plaintiffs Absolute Software Corporation and Absolute Software, Inc. and Defendants World Computer Security Corporation and Front Door Corporation have agreed to settle, adjust and compromise all claims and counterclaims in the above-captioned action. The parties, therefore, move this Court to dismiss the above-entitled cause and all claims and counterclaims made therein with prejudice.

The parties further move the Court to order that all costs and expenses relating to this litigation (including attorney and expert fees and expenses) shall be borne solely by the party incurring same.

A proposed Order accompanies this motion.

Dated: September 18, 2014

Respectfully submitted,

By: /s/ Paul A. Kroeger

Marc A. Fenster (CA Bar No. 181067)

E-mail: [mfenster@raklaw.com](mailto:mfenster@raklaw.com)

Irene Y. Lee (CA Bar No. 213625)

E-mail: [ilee@raklaw.com](mailto:ilee@raklaw.com)

Paul A. Kroeger (CA Bar No. 229074)

E-mail: [pkroeger@raklaw.com](mailto:pkroeger@raklaw.com)

Stanley H. Thompson, Jr. (CA Bar No. 198825)

E-mail: [sthompson@raklaw.com](mailto:sthompson@raklaw.com)

RUSS, AUGUST & KABAT

12424 Wilshire Blvd., 12<sup>th</sup> Floor

Los Angeles, California 90025

Telephone: (310) 826-7474

Facsimile: (310) 826-6991

John Cave (TX Bar No. 00783812)

E-mail: [jcave@gunn-lee.com](mailto:jcave@gunn-lee.com)

GUNN, LEE & CAVE, P.C.

700 N. St. Mary's Street, Suite 1500

San Antonio, Texas 78205

Telephone: (210) 886-9500

Facsimile: (210) 886-9883

Attorney for Plaintiffs

**ABSOLUTE SOFTWARE, INC. and  
ABSOLUTE SOFTWARE  
CORPORATION**

PERKINS COIE LLP

s/ Michael R. Henson

L. Norton Cutler (*Admitted pro hac vice*)

Michael R. Henson (*Admitted pro hac vice*)

1900 Sixteenth Street, Suite 1400

Denver, CO 80202

Telephone: (303) 291-2300

Facsimile: (303) 291-2400

Email: [ncutler@perkinscoie.com](mailto:ncutler@perkinscoie.com)

[mhenson@perkinscoie.com](mailto:mhenson@perkinscoie.com)

Kelly D. Hine

Texas Bar No. 24002290

500 North Akard, Suite 3300

Dallas, TX 75201

Telephone: (214) 965-7700

Facsimile: (214) 965-7799

Email: [khine@perkinscoie.com](mailto:khine@perkinscoie.com)

ATTORNEYS FOR DEFENDANTS

FRONTDOOR SOFTWARE

CORPORATION AND WORLD

COMPUTER SECURITY CORPORATION

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served upon all counsel of record pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(a)(1) via Electronic Filing through the Court's CM/ECF on September 18, 2014.

/s/ Paul A. Kroeger

Paul A. Kroeger